

Attorneys For Defendant Portfolio Recovery Associates, LLC

VINCENT ISMAEL,)	CASE NO. 2:22-cv-00209-JAD-VCF
)	
Plaintiff,)	STIPULATION AND ORDER
)	TO EXTEND TIME TO FILE
vs.)	RESPONSE TO COMPLAINT
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC)	(First Request)
and RAUSCH STURM LLP,)	
)	
Defendants.)	

1. Plaintiff filed his Complaint on February 3, 2022.
2. PRA was served with the summons and complaint on February 11, 2022.
3. PRA's responsive pleading is currently due March 3, 2022.
4. PRA retained Gordon & Rees as counsel to represent its interests in this matter.
5. PRA requests additional time to file its response to the Complaint up to and including April 4, 2022.
6. Plaintiff does not oppose the requested extension.

7. PRA has been informed that co-defendant Rausch Sturm LLP is filing its own stipulation for an extension of the responsive pleading deadline.

8. The extension, which is PRA's first requested extension, will allow PRA to investigate the allegations of Plaintiff's Complaint and permit the parties to explore possible early resolution without incurring unnecessary fees and costs.

9. This stipulation is not made for purposes of delay.

10. Accordingly, PRA will file its responsive pleading to Plaintiff's Complaint on or before April 4, 2022.

IT IS SO STIPULATED.

DATED this 3rd day of March, 2022.

**GORDON REES SCULLY
MANSUKHANI, LLP**

By: /s/ Lori N. Brown
Lori N. Brown
Attorneys for Defendant
Portfolio Recovery Associates, LLC

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce (with permission)
Gustavo Ponce
Mona Amini
Attorneys for Plaintiff

IT IS SO ORDERED:


United States Magistrate Judge

DATED: 3-15-2022